#### Cm

#### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

# RECEIVED END

JUL 172015 7-17-15 THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

Marto S. ENGLISH JR.	
	- ZMENDED COMPLAINT
(Enter above the full name of the plaintiff or plaintiffs in this action)	
VS.	Case No: 15 CV 3950
Tarry williams,	(To be supplied by the <u>Clerk of this Court</u> )
Lane Palmer	<u>-</u>
DEREK J. JaBurek	_ JUDGE John ROBERT BLIKEY
SZMUEL L. Johnson	<u> </u>
S. Johnson	_
(Enter above the full name of ALL defendants in this action. Do not use "et al.")	
CHECK ONE ONLY:	NENDED
COMPLAINT UNDE	R THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983 y, or municipal defendants)
	R THE CONSTITUTION ("BIVENS" ACTION), TITLE S. Code (federal defendants)
OTHER (cite statute, i	fknown)
BEFORE FILLING OUT THIS COM FILING." FOLLOW THESE INSTI	MPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR RUCTIONS CAREFULLY.

I.	Plair	ntiff(s):		
	A.	Name: Marto S. ENGLISH JR.		
	В.	List all aliases:		
	C.	Prisoner identification number: <u>B-57430</u>		
	D.	Place of present confinement: <u>STATEVILLE COLFECTEURL</u> CENTER		
	E.	Address: P.O. Box 112 Joliet, 12 60434		
	numl	here is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. ber, place of confinement, and current address according to the above format on a rate sheet of paper.)		
u.	I. Defendant(s): (In A below, place the full name of the first defendant in the first blank, his or her off position in the second blank, and his or her place of employment in the third blank. S for two additional defendants is provided in B and C.)			
	A.	Defendant: Takky williams		
		Title: WARDEN		
		Place of Employment: STATE VILLE COPPECTIONAL CENTER		
	В.	Defendant: LZNEL PZLMER # 9959		
		Title: RETIRED OR FIRED SQT. CORRECTIONAL OFFICER		
		Place of Employment: was stateville collectional CENTER		
	C.	Defendant: DEREK J. JEBUREK #8787		
		Title: Collectional extical		
		Place of Employment: Stateville Coffectional CENTER		
		ou have more than three defendants, then all additional defendants must be listed rding to the above format on a separate sheet of paper.)		

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D. DETENDENT: SOMUE | L. Johnson #5112

title: Colfectional officel

place of Employment: Stateuille Colfectional CENTER

E. DETENDENT: S. Johnson #10148

1/1/1E: Cellectional etticel place et employment: stateuille correctional center

T. DETENDENT: Haleh OBJISI

title: Docke

place of Employment: Stateville correctional officer

A.	Name of case and docket number: 1983 Civil Claim 13-1199
B.	Approximate date of filing lawsuit: 5-8-2013
C.	List all plaintiffs (if you had co-plaintiffs), including any aliases:
D.	List all defendants: MZRK MCNZBB, RZNDY PFISTER, JUEL STZRKEY, SHELKY BENKEN ZNOL Johnwy WZTSON.
E.	Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): CFNFR DISTRICT PERTO DIVISTON
F.	Name of judge to whom case was assigned: CHTEF JUDGE  JUMES E. SHODTO
G.	Basic claim made: Father to protect claim, conditions of contine deliberate inditterence to serious medical needs, and retaliation claim.
H.	Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending? Summary Judgment Stage

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. COPLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

## PRELIMINALY STATEMENT

THE is a civil rights action; Being brought by Marto English IR. 2 state prisoner. THE plaintiff is steking compensatory, purlice monetary damages ter excessive terce, sexual violations which include unconstitutional strip search, deliberate inditterence to my serious medical NEEds, condutions of continement. ZUIN violation of plaintites (2th Amendment) plaintite has a right to be TREE From cruel and unusual punishment PRISON OFFICIALS did not RESPONDE to Plaintiffs griEVENCES in violation of the FIRST and FailtEENTH JMENDMENT. plaintiff is alleging that the administration is thindering and for PRECluding plaintiff from Exhausting his Grievances all the way to the commission administrative REVIEW Board in springfield, Minois and therefore also violating plaintitis constitutional right Guarantee under the "Eurteenth and FIRST AMENDMENT" to SEEK REDRESS IN 2 COURT of LOW 2 lso, violating plaintiffs constitutional Right under the FIFTH Emerchment, which violates plaintites due process rights Each detendant is being sued in these individual capacity Jud office capacity Ill detendants have acted under color of state law at all times Relevant to this complaint.

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

OA ON NOVEMBER-2-2014 1 Shift time unknown unit, x-house upper Jaburek and Sof. Palmer came in cell 5 2 string From 2 Round plaintiffs NECK Johnson Flo148 Zurd Dlawhiff to Squate down NSON 70148 told souate down after Maintiff Souated over. have said Bend Squate down. HOWEVER, 591. 12 MER the squate when plaintiff Sold, No. Sat. IN MY LEG. Sat DE INFL END CO JEBUREK and pulling my hair out. O Jabupek It wything was there. Now 1174 did SZY he wants medical attention who LEFT CELL#5 GO JOBUREK, S.J. palmer, S. Johnson 10148

Samuel (. Johnson #5112. Internal attails officers (where Augero) and Clo X. taylor were there. Yo Augero took pictures of plaintiffs leg, back and hair on floor, and I believe left big toe.

plaintiff was never allowed a chance to report staff beating on ME.

after complaining to complaining, plaintiff was finally allowed to give a statement to Internal attails afficer peike only about sqt. palmer sexually violating my privacy, plaintiff was never allowed to report staff for beating on Me.

I gave the statement to officer peiece around January 21 to 30-2015.

I was on suicide watch and difficult to remember all dates. I was sent to the health care unit and traced in 4 point restraints for 4 hours by the tack teamfortance crush. Camera used! I was devied pain Medication.

(2) B can actable at 2014 a shift time unknown I was in x-house. I was taken to health case by Lieutenant schwartz. I seen Docke Haleh obdisi I told, abdisi about the injuries and pain i was having. I wasn't given any pain medication. I don't know what are obdisi what down but this is what i told the Dr. I had Rib pain, head pain, should pain, my left big too was busted open and statifues punching me and hurting me in other ways besides using there fist. I told the Dr. I about the cut i had on my left and right the arms, Both hands on Fingers bruises on left arm and Right arm where the cuts go and

Cuts on LEFF stomach by belly button, you see this GRIEUZICE was written 11-20-2014. I was dealing with pain all the way up to november 6th when i was tivally given something the pain which didn't help much. It was issued to me that month now 6th to Dec 6th 2014. told about out on tace and topehead.

De terry williams is the werden of stateville correctional center he is awar of everything that goes on with plaintiff and does nothing to stop it or help. plaintiff intermed the warden several times, that plaintiffs life is in danger by prisoners and state, prisoners want to assault thill plaintiff I given the chance. State beats on plaintiff and plaintiff can't report it. False ticket's them state sexual violations by state, want's lie detector test, want's thanster, placed in administrative had or detention in health care and moved them enemies in F-house segregation. prison afficialis dent answer my grievances.

PRECLUCION PLAINTITT TRAN EXPLANTANTA PRECLUCION PRECLUCION PRECLUCION PRECLUCION PRECLUCION PRECLUCION PRESIDENTE REVIEW BOARD IN SPRINGITED, Illinois and therefore also violating plaintitts constitutional Right.

BUARANTE UNCLE THE, FOURT EENTH AND FIRST AMENDMENT!

TO SEEK REDRESS IN A COURT OF LAW. Also, violating plaintitts constitutional Right under the FIFTH AMENDMENT which violates plaintitts due process Rights.

## V. EXHAUSTION OF LEGY REMEDIES

#4A

plaintitt Exhausted all available administrative Remedies For my claims.

THE PRISON LitigAtion RETORM Act does not detrive "availability"
TOR PURPOSES OF the exhaustion requirement.

Plaintiffs claims cannot be dismissed IF prison employees do not respond to a properly tiled grievance or otherwise use attirmative misconduct to prevent a prisoner from exhausting. "Dole v. chardler, 43% F. 3d 804, 809-10 (7th cir 2006).

B. Exhibit A pg 14, Is a letter to conselor Harry

Explaining plaintiff timely Filed 8 grievance 6 dated 11-19-2014

and 2 dated 11-20-2014. Plaintiff asked counseld Harry

Do you have any of \$ Grievances or were they torward to

counselor miles? and why havn't i received a response?

Counselot Hillet Response. I RECEIVED 4 grievances Fronzen on 3-12-2015 dited 3-4-2015 and 3-5-2015. I don't have any other grievances

plainliff still hasn't received responses on all tent of these grienere.

C. Exhibit B pg 13, Is a letter to Grievance officer dwnd mcbe, cc11. it says I am sending you & grievances be are dated 11-19-2014 and 2 dated 11-20-2014.

The counselor did not respond to these grievances.

I believe istill have to send these grievances to you and springtick. please let me know you received these grievances.

D. Exhibit c pg 16, Dated 4-23-2015 is a copy Fronthe Grievance afficer.

E. Exhibit D pg 17, Is a paper that says, Imate Gricuance Procedure.

Quick facts #4 is circled. It says, IF an immate does not receive a response at any stage of the process, he she should move along to the next step in the process, including a note as to why the prior stage was not completed.

this was is what plaintiff did.

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F. ExhibitE pg 18, is a paper from the administrative review board showing they received grievences dated 11-19-2014 and 11-20-2014.

G-Exhibit F pg 19, Is a grievance dated 11-20-2014
it is a grievance Filed against Doctor Haleh obaisi and
it Explains plaintites pain and injuries and devised medical
treatment.

H. Exhibit G pg 20, Is a grievance dated 11-20-2014

it's a grievance filed against detendants, Sgt. Lanel Palmer,

DEREK J. JaBurek, Samuel L. Johnson, S. Johnson

it Explains what happened to plaintitt.

I Exhibit Hpg 21, Is a Letter dated 12-2-2014

From warden tarry williams. plaintit received this letter

after he wrote tarry williams a Letter plaintit does not
have a copy of the Letter to the warden. However, plaintit

will write some of the issues he wrote to the warden.

plaintitts Lite is in danger by prisoners and statt prisoners went to assent thill plaintitt IT given the chance. Statt beats on plaintitt and plaintitt cant report it. False tickets them statt, sexual violations by statt, wants lie detected test, wants thanter, placed in administrative held or detention in health care and moved from enemies in T-house segregation prison officells don't assuel my grievances.

J Exhibit I pg 22, is a copy of the front page of a temporary restraining order. RECEIVED 5-4-2019
By Judge John Robert Blakey and
Magistrate Judge JETTREY T. Gilbert PC4

Exhibit I pg 23, is a Grievance dated 4-17-2015
it was a linely tiled Grievance. This Grievance was apart
of the temporary restraining case received 5-4-2019.
plaintiff still hamiteceived a response on this Grievance.
which is turther proof counselors only answer Grievances
that they want to answer.

plaintiff want's to point out on the back of GRELENCE dated 4-17-2015. warpen tarry williams made rounds in F-house 4-18-2015 plaintiff third to stop the warpen but he just kept going.

this grievance clearly says, I have intermed the warpen taken by letter and verbally, that plaintites lite is in danger by prisoners in I have and state at statewith prisoners want to assault and kill plaintite II given the chance state boats on plaintite and can't report it. Take tickets than state, sexual violations by state wants lie detected test, wants than state, and of state than the placed in administrative holder detection in health case and moved them enemies in I house segregation. I can't go actside without being attacked, prison atticalls don't answer all my grievances. Etc.! End.

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TO: F-house counselor Harris From: Marso S. English B57430 F-house 222 3-8-2019

I timely Filed & grievance dated 11-19-2014-2-dated 11-20-2014
Counselor Hall isn't here anymore.

Do you have those grievances or were they forward to downselor miles?

why havn't i RECEIVED a RESPONSE?

from you on 3/12/15 dated 3/4/15 and 3/5/15

Il don't have any other greams

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To: GRIEUZICE AFICER DINA MCBE, CCII FROM MERTO 5. English B-57430 F-house 208

I am SENDING you & GRIEVENCES.
6 are dated 1 11-19-2014 and 2 dated
11-20-2014

The courseles did not respond to these grievances

I Believe i still have to soud these arievences to you and springtield.

Please Let ME Know you received these arievances

thank You!

RECEIVED
JUN 0 1 2015
ADMINISTRATIVE
REVIEW BOARD

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# Illinois Department of Corrections

£208

Exhibit C
Bruce Rauner
Governor

Donald Stolworthy
Director

Stateville Correctional Center Route 53, P.O. Box 112 Joliet, IL 60434

Telephone: (815) 727 -3607 TDD: (800) 526-0844

#### MEMORANDUM

DATE: 4/23/15

TO: English B57430

FROM: GRIEVANCE OFFICER

RECEIVED

JUN 0 1 2015

ADMINISTRATIVE
REVIEW BOARD

#### SUBJECT:

The att	ached grievance is being returned for the following reason:
	It needs to be rewritten and submitted to your counselor on the attached IDOC Offender's Grievance form.
X_	It was not filed within 60 days of discovery of the incident, occurrence, or problem which gives rise to the grievance as required in DR 504F, Grievance Procedures for Committed Persons.
	Issue needs to be discussed with your counselor for possible resolution.
	No issue outlined in grievance.
	It appears that no attempt has been made to resolve the issue as required by DR 504F. Submit grievance to your cell house counselor.
	Issue is currently being reviewed by the Office. *You will receive a copy of the Grievance and decision when it is completed.
	Issue previously addressed on. No justification for further action.
X cc:	Other: Originals required for future grievances file

I received this back in regards to GRIEVANCES dated, 6 11-19-2014 and 2 dated 11-20-2014 THE originals were not sent back to me trem the consekr. That subject copies to grievance officer.

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## Inmate Grievance Procedure

Prepared by the Uptown People's Law Center

Quick Facts

- 1. Before filing a lawsuit, an inmate MUST complete the grievance process. Therefore, it is important that all prisoners with a grievance start and complete the process as soon as possible.
- 2. Grievances must include as much detail as possible, including specific names, dates, and facts

3. A grievance must be filed within 60 days of the incident giving rise to the complaint.

- 4. If an inmate does not receive a response at any stage of the process, he/she should move along to the next step in the process, including a note as to why the prior stage was not completed
- 5. If filing a grievance about a facility other than the one where the prisoner is currently incarcerated, the grievance can be sent directly to the ARB.
- 6. It's VERY important to keep notes and records of any communications with prison staff about the status of grievances.

#### The Grievance Process

- Step 1: Fill out the grievance form, including as many specific details as possible, within 60 days of the alleged incident.
- Step 2: Bring the issues and the grievance form to the attention of the prison counselor. If the counselor is unable to resolve the issue informally, follow the remaining steps.
- Step 3: After obtaining the counselor's signature, submit the grievance form to the prison's Grievance Officer by depositing it in the living unit mailbox or the place designated by the prison.

o IMPORTANT: Keep a copy of the grievance.

- o The Grievance Officer will review the grievance and forward his/her recommendation to the Warden, who will make the final decision at the prison.
- The Warden has 2 months to respond to a grievance.
- Step 4: If unsatisfied with the Warden's decision, appeal the decision to the Director of the Illinois Department of Corrections by sending your grievance to the Administrative Review Board (ARB) within 30 days of the Warden's decision.

o Include a copy of the Grievance Officer's report and Warden's decision with the appeal and keep a copy of all documents.

- o If the grievance was rejected by the Grievance Officer/Warden as untimely, include an explanation of good cause with the appeal to the ARB detailing why the appeal was not filed in time, attach any supporting notes or documentation.
- o If you do not receive a response from the Unievance Officer/Warden within 2 months, forward a copy of your grievance to the ARB stating that you did not receive a response.

o The ARB has 6 months to respond to a grievance appeal.

If no response is received within 3 or 4 months, write a letter to ARB inquiring into the progression of their decision.

Completion of the Process: The grievance process is only complete after each of the above steps has been taken. An inmate CANNOT file a lawsuit until he/she has completed the entire process.

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ILLINOIS DEPARTMENT OF CORRECTIONS

## Administrative Review Board Return of Grievance or Correspondence

•	Return of Grievance or Correspondence	
Offender Facility: ⊠ Grieva Received	Last Name    Mary   B57430     Stateville   C	-
Γhe attac	ed grievance or correspondence is being returned for the following reasons:	
Addition	information required:	
□Р	ovide a copy of your written Offender's Grievance, DOC 0046, including the counselor's response, if applicable.	
☐ P <u>C</u>	ovide a copy of the Response to Offender's Grievance, DOC 0047, <u>including the Grievance Officer's and Chief Administrati</u> ficer's response, to appeal.	<u>ve</u>
□ P	ovide dates of disciplinary reports and facility where incidents occurred.	
g	able to determine nature of grievance or correspondence; submit additional specific information. Please return the attache evance or correspondence with the additional information requested to:  Administrative Review Board Office of Inmate Issues 1301 Concordia Court Springfield, IL 62794-9277	d
Misdirec		
	ntact your correctional counselor regarding this issue.	
0	quest restoration of Statutory Sentence Credits to Adjustment Committee. If the request is denied by the facility, utilize the ender grievance process outlined in Department Rule 504 for further consideration.	
	ntact the Record Office with your request or to provide additional information.	
	rsonal property issues are to be reviewed at your current facility prior to review by the Administrative Review Board.	
□ · A	dress concerns to: Illinois Prisoner Review Board 319 E. Madison St., Suite A Springfield, IL 62706	
	redress: vard of Supplemental Sentence Credits are discretionary administrative decisions; therefore, this issue will not be addressed ther.	d
N	it submitted in the timeframe outlined in Department Rule 504; therefore, this issue will not be addressed further.	
	is office previously addressed this issue on	
	justification provided for additional consideration.	

Leslie McCarty
Signature

Date
DOC 0070 (Rev.4/2013)

Distribution: Offender Inmate Issues

Completed by: Leslie McCarty

Print Name

Other (specify):

129 Illinois Department of Corrections
OFFENDER'S CRITICALE

129
OFFENDER'S CRITICALE

O

## ILLINOIS DEPARTMENT OF CORRECTIONS OFFENDER'S GRIEVANCE

Date: 11-20-2014	Offender: (Please Print) MALT	5. ENG/ #5#	1-70	10#: B-57430
Present Facility: STATEUITE	00	Facility where grievance issue occurred:	Statewill	12 CC
NATURE OF GRIEVANCE:		Joseph Good Hou.	3/8/10/1/	
☐ Personal Property ☐ Staff Conduct ☐ Transfer Denial by Facility	☐ Mail Handling ☐☐ Dietary ☐☐ Transfer Denial by Tr	Restoration of Good Tim Medical Treatment ansfer Coordinator	Disability HIPAA Other (spe	
Disciplinary Report:	/ / Date of Report		Facility where issued	
Note: Protective Custody De	nials may be grieved immediat	ely via the local administration	n on the protective cu	stody status notification.
Complete: Attach a copy of any pertir Counselor, unless the issue invo Grievance Officer, only if the iss Chief Administrative Officer, o Administrative Review Board, administration of psychotropic dr Administrative Officer.	olves discipline, is deemed an sue involves discipline at the pi nly if EMERGENCY grievance only if the issue involves transi	emergency, or is subject to di resent facility or issue not res fer denial by the Transfer Coo	rect review by the Adolved by Counselor.	ministrative Review Board.
Brief Summary of Grievance:	act 27 = 2014	2 shiff time	unkrown	IWES
taken to health ca	DE By U. Schre	ests I see	U DR. Halo	th OBAISI
I Yold DR-OBAL	SI II had RID	DZIN, head pain	+ ShouldEl	pein.
I wasn't given a	sy pain pills.	I also told of	BAISI MY C	ETT BIG LE WES
Busted open. and sto	ITT Was purch	vg ME and hug	ing in other	wegs BESides
USING THELE TISY I	Yeld NIM, OBAID	Joseph She a	ets I had	co my lett
SUN hEDE MILLEN	FOR HANDSON	TINGERS BRUIST	5 CN (FIT	Zen Bus Right
I did it get 2011	CUID GO. CNA	0 02/1 00 CET/	Stemach b	4 BE119 RITTON.
2014 2 dines 5	True told about a	A STE TERME	VOV. La Un	11/10 DEC 6.
Relief Requested: 1000 4/ Pour	of the GRIEVENCE	DROCFEDURE CLUSTI	Task tel McRi	Ejw civil court
8th AMERICANENT DECK	hibits the "unne	CESSARY and u	Danten int 1	liction of
pain EstellE V.	Ganble	8	2	Υ.
Check only if this is an EMERGEN	CY grievance due to a substan	tial risk of imminent personal	injury or other serious	or irreparable harm to self.
Mario S. Engle	der's Signature	B-57	430	11,20,2014
Onen		everse side if necessary)	ID#	Date
	Counselor's I	Response (if applicable)	J	
Date Received: / /	Send directly to Gri	A	Dutside jurisdiction of the distribution of th	Board, P.O. Box 19277,
Response:		RECEIVE	<b>)</b>	
	white many and a series and a s	JUN 0 1 2015		
		ADMINISTRATI	VE .	
Print Counselor's	Nome	REVIEW BOAR	Signature	/ / Date of Response
Time Gourseion a			Signature	Date of Mesponse
Data	EMERG	ENCY REVIEW		
Date Received: / /	is this determined to b	oe of an emergency nature?	Yes; expedite er No; an emergen Offender should sub In the normal manne	cy is not substantiated.  omit this grievance
Chief	Administrative Officer's Signature			/ / Date

Distribution: Master File; Offender

## ILLINOIS DEPARTMENT OF CORRECTIONS OFFENDER'S GRIEVANCE (Continued)

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DOC 0046 (Rev. 3/2005)

To: counteled Case: 1:15-cv-03950 Document #. 147 Filed: 07/17/15 Page 21 of 36 Page 10 #146

ILLINOIS DEPARTMENT OF CORRECTIONS OFFENDER'S GRIEVANCE

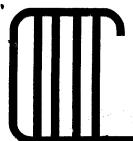
Date: 11-20-2014	Offender: (Please Prin	o Mapt	5 FA	16/15H	40	10#: B-57430
Present Facility: SAFUILE	00		Facility who	ere grievance	StatevillE	00
NATURE OF GRIEVANCE:			issue occui	rea:	SIGIEUTIC	
☐ Personal Property ☑ Staff Conduct ☐ Transfer Denial by Facility	☐ Dieta	Handling [ ary [ sfer Denial by T	] Medical T		Disability HIPAA Other (spe	
Disciplinary Report:	Date of Report	t -			Facility where issued	
Note: Protective Custody De Complete: Attach a copy of any perti Counselor, unless the issue inv Grievance Officer, only if the is Chief Administrative Officer, on Administrative Review Board, administration of psychotropic d Administrative Officer.  Brief Summary of Grievance:	nent docum rolves discipl sue involves only if EMER only if the is rugs, issues	ent (such as a Dis line, is deemed ar discipline at the p GENCY grievance isue involves trans	ciplinary Report n emergency, c present facility e. sfer denial by t lity except pers	t, Shakedown Red r is subject to di or issue not reso he Transfer Coo	cord, etc.) and send to rect review by the Ad olved by Counselor. rdinator, protective co sues, or issues not re	ministrative Review Board.
My NECK ON THEN	my co	11, #5 upp	os center	to leve	x a string	ohusen Big Guy
5- Dehason teld ME to 5-TER that, Clo Dalmel a	SQUAL SQUAL SQUAL	ne 15 things	rek. Pather th Backe	w Berd	are. I di	d Souste down *
he kicked me with in my head and Back a	his Right	tleg. Ap	Almer to	Je Saluk	ek stalted po	asching ME in
THE OPEN AND ESKENDE  Relief Requested: Loca HARA	AETA. BUREK al, Hhz (	TF JULY	GlIBBEI hivg we Sometime	s thepe	The Butt &	Vick and pulled
Thansfired out of sta	MAN	and NEUTH	LETURNEZ ESSIVE Z	1 to sta		Suspend 211 Lit. End!
Mario 5 Engill	CY grievanc	9	ntial risk of imr	B.574		or irreparable harm to self.
		Counselor's			7	
Date Received:// Response:		Send directly to G		or 🗆 o	utside jurisdiction of dministrative Review pringfield, it 62794-	Board, P.O. Box 19277,
				u IAI A	1 2015	
				JUN °	TDATIVE	
Print Counselor's	Name			REVIEV	V BOARD.	/ / Date of Response
Date Received://	is t	EMERC	be of an emer		Yes; expedite er No; an emergen Offender should sub in the normal manne	cy is not substantiated.
Chie	Administrative	e Officer's Signature			engineratura di mandanga manadada di Angalada	/ / / Date

#### ILLINOIS DEPARTMENT OF CORRECTIONS OFFENDER'S GRIEVANCE (Continued)

Three 41/1+7 -2 Pla 5 ) ah 15-11 /4 ) ah 16-11 ch 15-1/10ND	i
they 3/1 (EFT. 2 C/o S. Johnson, Ut. Johnson, Gopalmer,	
REND CO JABUREKI	
These cotices had in light using EXCESSIVE FERCE on ME.	
Tild I tes of 7 wells how	
+ Max + 13/ dy may	
I was on suicide wortch alteady. I was sent to health cape to be placed in 4 pt. point les laints.	
- 35 and long of lot stored in 4 st sint	
I was sent to mouth the re- new factor in If if	
PFS1021145.	
, and the second of the second	
All A Port	
I told wurst Athena I had head to back pain.	
I told nulse Athena, I had head to Back pain. I wasn't given any pan pills.	
- MASNI GIVE CNG pan pip.	
this DELIBERATE inditterence to my serious medical NEEDS.  which violates the Ethanendarent  (vitress who heard what was going a  man ) ohn wilson level-e-sey.  End!	
THIS DELIBERATE INAUTORENCE TO MY SCHOOLS PRICEILE I POLICE -	
which violates the Em Avendarent	
without a house of a hat a las one	لبرد
COTINGO WILL VOKET WES TOTALE	
Some John Wilson LEVEL-E-SFG.	
- Card	
	**********
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210F32



#### Illinois **Department of Corrections**

Pat Quinn Governor

S. A. Godinez Director

**Stateville Correctional Center** Route 53, P.O. Box 112 Joliet, IL 60434

Telephone: (815) 727 -3607

TDD: (800) 526-0844

December 2, 2014

Inmate: Mario English- B57430- MS129

**RE: Inmate Issues** 

Dear Mr. English:

This is in response to your recent communication to me regarding an issue or concern that you expressed. Your concerns are being reviewed and referred if necessary to the appropriate individual for resolution.

If there is a need for additional information or a formal response you will be notified in writing. I appreciate that you took the time to communicate your concerns and observations to me.

I trust this is responsive to your request.

Sincerely

Tarry Williams

Warden

TW/jal

CC:

File

22 07 32 107 2628

ExhibitI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS ECEIVED

EASTERN DIVISION MAY 04 2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Marto S. ENGLISH
Plantit,

115

ORDER TO
Cause Fer A

15cv3950 Judge John Robert Blakey Magistrate Judge Jeffrey T. Gilbert

TORRY Williams Et. 21, DETENDANTS

> INSUNCTION > A TEMPORARY

> RESTRATIVENG > OR DER

NO.

A TEMPORARY RESTRATINETUS ORDER

Now comes plaintiff, Mario S. English pro-se Respectfully Moving this honorable court, pursuant to Rule 65 (b) of the Federal Rules of civil Procedure, and title 18 U.S.C & 362 (1)(2) SEEKing a temperary Restraining order against Tarry williams.

	Case: 1:15-cv-03950 Document #: 14 Filed: 07/17/15 Page 25 of 36 PageID #:150	, <b>s</b>
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To: courselect de l'195-cv-03950 Document #: 14 Filed: 07/11/195 Page 20 of 36 Page 10/41/51
T-house Room 208 OFFENDER'S GRIEVANCE

Date: 4-17-2015	Ottonder: (Please Print) NAZRI	o 5 ENGLE	54	B-57430
Propert Facility: Statewille	CC.	Facility where grievence leave ecoured:	Stateuille	ce
NATURE OF GRIEVANCE:				
Personal Property Staff Conduct Transfer Denial by Facility	Mail Handling Dietary Transfer Denial by 3	Restoration of Good Time Medical Treatment Transfer Coordinator	☐ HIPAA ☐ Other top	ability Accommodation
Disciplinary Report:  Note: Protective Custody De		ately via the local administration		stody status notification.
Complete: Altech a copy of any perti- Coursetor, unless the issue in- Grievence Officer, only if the is Chief Administrative Officer, o Administrative Playley Bay administration of psychotropic d Administrative Officer.	chies discipline, is deemed as sue involves discipline at the pay if limitification of province only if the issue involves trainings, issues from another fac-	n emergency, or is subject to di present facility or leave not res is. lefer denial by the Transfer Coc lifty cocept personal property is	rect review by the Acolwed by Counselor. irdinator, protective c sues, or issues not re	Iministrative Review Board. sustody, Involuntary sectived by the Chief
Summary of Grievance (Previde Inform for each person involved):	nation including a description of	l what happened, when and when	s it happened, and the	name or identifying information
Ut. BERRY Yeak ME YO		and the second of the second o		
		lians that i have		
and Kill ME IF given th		The second secon		
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water on me, urine	and the second of the second o			
I have a Right to a		7/ //.		•
	in F-house wh			The state of the s
Pulled Requested: SENT to he				visterlive held or
detention untill i am		<i>O</i>		
ENEMY PROBLEMS AND A				
Check only if this is an EMERGEN	ICY grievance due to a subst			
marin C Force	· /	0-67	130	4,17,2015
Mario S. Englis	vior's Signature		10e .	Date
-	' (Continue e	n severee elde M mesessary)		
	Counselor's	Response (V applicable)		
Date Received:/	Send directly to 6			this facility. Send to Board, P.O. Box 19277, 9277
Response:		•		
		· · · · · · · · · · · · · · · · · · ·		
			•	, ,
Print Counselor's	Name :	Counselor	Signature .	Dete of Response
	EMER	GENCY REVIEW	T	
Date		Burner of the second states and the second s	-4	
Received:/	is this determined to	be of an emergency nature?	No; an emergen	mergency grievance
		e e en	Offender should suit in the normal mann	
- Control of the Cont	Administrative Oilloor's Signature	Name of the second seco		
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Distribution: Master Elle: Officerier

Dane 1

DOC 0046 (8/2012)

# Case: 1:15-cv-03950 Document #: 14 Filed: 07/17/15 Page 27 of 36 PageID #:152 OFFENDER'S GRIEVANCE (Continued)

The been in plente of Fights - I don't want to Fight suchody. I don't have perde
issues. I don't have worthing to DROVE. I want to Make it home so i canhavia Lite
issues. I don't have worthing to prove I want to make it home so i canhaved Lite like you people prise i don't were Me. there's plenty of people to take My place. I
don't stalt drama then ask top left. In not in a gang and i don't do what the
garge de, so it couses many peoblems ter me. I detend myself se i con
instraction Transfer was when and and the fatter due
to so many Entities. I can't go out side without being attacked so the
THE SO MENT CAPTULES. I CAN TO CUT STORE WITHOUT DESIGNATION SE BANGE TO
suppose to stay inside tel the lest of my life Because i have eveniles who want
to attack Mr. Humans weed yard time. I have had yaed toll 6 months.
2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
I Know what will happen. How many times do i have to go through it?
Fight in mended was on the Yalad. Fightin poutlac was on the yard its
not whate up hight but i was whate up top assault because I hetused to talk abuse
est Authority. I Fright a guy wanted Richy Rich on the postie yerd butit
couldn't lit PECCROCA by I-A bECZUSE Richer + RENSFERED the WEXT day 27/6RI
YELKED to I-A. this was just an EXCUSE. I-A didn't want to do anything.
I was sufficient by fair Deputation PRISONERS on the postide yerd
and attacked by 3 of them. that is what my lawsuit is toe Tailuet to pretect claim
I have a court date this June-2015.
this doesn't count myother Fight's and when i had surgery in (09) at
MENZRd. (Enough is Enough).
warpen tarry williams made Rounds in F-house 4-18-2015. I third to stephin.
But he just kept walking. I have intermed the warpen tarry by letter and
UERbally, that plaintitts life is indanger by prisoners in thouse and state at statewise
PRISONERS Want to assault and Kill placeful It of given the chance - state beats on placeful
Just Can't Report it. False tickets Flow staff, Sexual violations by staff wants lie
detected test, wasts transfer, and out of state transfer. Placed in administrative
hold chaleterstion in health care and moved From FNEMIFS in F- house segregation
I cout go atside without being attacked prises afficals don't ensuch all my
gilievasces. Forete'. End.
FER the Leach.
en 3-8-2015 PRISONERS COME out of there outs in the shower while cells well
shaken down when a certain prisonenent to the shower, he was attacked while in
hand cutto. In just showing this isn't & sate annicement, prisoners strike tirst
chance they get. I was told by the attacker I was lucky it just left
the should he was gown attack both of us we had past anguements
0
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DOC 0048 (8/2012)

## VI. claims whom which Relief may be Granted

A that the deliberate actions of warden tarry williams are in violation of the Eighth Amendment, the Right to be tree from cruel and unusual punishment, tarry is well awar of what been going on with plaintitt and has done nothing to stop it larry is reckless and will centime to do so. plaintit has intermed warden tarry williams by letter and verbally, that plaintitts lite is in danger by prisoners in theme and statt at statewill correctional center. prisoners want to assault and Kill plaintit It quen the chance statt beats on plaintit and cant report it. Talse tickets trom stati, sexual violations by statt wants lie detected test, wants transfer and out of state transfer, placed in administrative holder detention in health care and moved from enemies in though detention in health care and contride without being attacked prison officialls don't assume an assume all my quievances etcend.

B. that the deliberate actions of Delek J. Jaburek and Sql.
Lanel Palmer was conducted with malicious and sadistic
intent by using unecessary, "Excessive torce" which is
in violation of the EIGHTH Amendment, conditions of continement
and right to be tree tran cruel and unusual punishment
DEREK J. Jaburek and Sqt. Lanel Palmer

The reckless and will continue to do so. Sqt. palmer Backed plaintiff to the Back of the CELL and Kicked me in the leg with his right leg. Sqt. palmer and clo Jaburek started punching plaintiff in the head and Back and pulling my hairout. when i was on the ground, sqt. palmer kneed me in the head. In paper course con the ground, sqt. palmer kneed me in the head. In paper course.

C. that the disliberate actions of sql. galance Lanel Palmel is in violation of the EtGHTH Amendment, conditions of Continement and the right to be Free From cruel and unusual punishment. Sqt Palmer Conducted an unconstitutional strip search, In that palmer Grabbed my Right part of Buttand pulled it open and asked clo Jaburek FF anything was there. It Jaburek Said, no. Sqt. palmer is reckless and will continue to do so.

D. that the deliberate actions of, Go DEREK J. Jaburek, Sqt.
Lanel Palmer, Go Samuel L. Johnson and S. Johnson Tolle
are in violation of the ETGHTH amendment, the right to
be tree from cruel and unusual punishment. Conditions of
continement. deliberate inditaterence to my serious medical
needs. all staff member are reckless and will continue
to do so when staff left cell 5. plainlift asked all staff For
Medical attention. plaintiff didn't receive any medical attentions.

E. that the deliberate actions at prison atticalls, they did not respond to Grievance dated 11-20-2014 concerning Sqt. Lanel Palmer, Derek J. Jabrek, samuel L. Johnson and S. Johnson to 148 prison afficults are reckless and unil continue to do so plaintiff is alleging that the appropriation is tindering and/or Precluding plaintiff from exhausting his Grievance all the way to the administrative Review Board in springifield, Illinois and therefore also violating plaintiffs constitutional right Guarantee under the, "Fourteenth and Etrst Amendment" to seek leptus in a court of law. Conditions of continement also, In violation of the EIFth Amendment which violates my due process rights.

F. that the deliberate actions of Doctor haleh obaisi is in Violation of the ETGHTH amendment, the Right to be tree than chuel and unusual punishment-plaintitt did not get any pain pills untill november 6-2014

DR. obaisi Denied plaintitt medical theoloment tor many days oct -27-2014 to NOV-6th -2014 which is Deliberate inditterence to my serious medical needs conditions of continuent. DR-obaisi is reckless and will continue to do so.

#### 27 of 32

G. that the deliberate actions of prison officalls, they did not respond to Grievance dated 11-20-2014 concerning Doctor haloh OBA ISI. prison officalls are reckless and will continue to do so. plaintiff is alleging that the administration is thindering and/or Precluding plaintiff them exhauting his Grievance all the way to the administrative review board in spring tield, Illinois and therefore also violating plaintiffic constitutional right Guarantee under the, "fourteenth and First Amendment" to seek Repress in a court of Law. Conditions of continencent also, Invitation of the FIFTH Amendment which violates my due process rights.

He that the deliberate actions of prison officials, they didnot respond to Grievance date 4-17-2015 concerning warden talk williams, etc! prison officialls are reckless and will continue to do so plaintiff is alleging that the administration is hindering and/or precluding plaintiff from exhausting his Grievance all the way to the administrative review be and in springitield, luinois and there to re also violating plaintiffs constitutional right Guarantee under the, "Fourteenth and FIRST AMENDMENT," To seek REPRESS In a court of Law. Conditions of continuent also, In violation of the FIFTH AMENDMENT which violates my due process rights.

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28 cf 32

wheretere plaintitt respectfully prays that this court enter judgment granting plaintitts,

## VII. RELIEF REQUESTED

- A. Damages, Zward plaintitt monetary Damages in the amount of lopes against Each detendant.
- B. Zward plaintiff Monetary damages in the Amount of local against Each detendant tex his pain and sutterly Enctional Stress and Mental anguish
- C. Exemplary [movefally and hunitive] damages against Each detendant in the amount of ho,co.

#### 30 of 32

O. I SSUE à DECLARATELY JUDGMENT STATING: I declaration that the acts and emissions described herein violated plaintites rights under the Constitution and Laws of the united states.

E. Release the Plaintiff from punitive segregation and place him in protective custody, with lesteration of all lights and privileges

I ONE MON Status in stylegation Even It plaintit franctes

G. SENT to partiac SEGREGETION OR parties protective custody PERMONENTY.

H. SENT to statewill correctional center health care unit tor administrative hold or detention until transfer or untill out at state & renoter occups, due to death threat's.

I Taken of Highly Escape Risk (LEWEL-E-ID CORD)

J Plaintitis costs in this surt.

A dry additional Relief this court deems just, proper and Equitable.

31 of 32

THE plaintiff demands that the case be tried by a jusy \$ 185 DNO

Respectfully submitted,
Mario S. English A.P.

CERTIFICATION

By signing this complaint. I certify that the tects stated in this complaint are true to the best of My knowledge, intermation and belief. I understand that It this conficiency is not correct. I may be subject to sanctions by the court

Signed this 1st day of July . 2015

Mario S. Engelesh Af.

Marte S. ENGLISH JR. B-57480

Stateville celectional center

P.o. Bex 112

Joliet, IL 60434

E15-727-3607

## Case: 1:15-cv-03950 Document #: 143-21ed: 03/207/15 Page 36 of 36 PageID #:161

INTHE

VALLED STATES DI	STRICT COURT
NORTHERN DISTRICT OF ILLIUQIS	
EASTERN DI	VISION
Marto S ENGLISH	,
Plaintiff,	)
v.	) Case No. 15 - CV-3950
	) Case No. 12 CV-3120
Tappy williams et al.,	)
Defendant	)
PROOF/CERTIFICA	TE OF SERVICE
TO: Prisoner Correspondence Ofcaro	
United States District Court	Assistant Attorney General
219 South Dearborn Street	General Law Bureau
Chicago, Illinois 60604	100 West Randolph Street, 13th Floo
,	Chicago, Illinois 50601
TO:	
TO: TO	:
PLEASE TAKE NOTICE that on July-to documents listed below in the institutional mail properly addressed to the parties listed above for Service:   OPRISANT CORRESPONDENCE TO CONTROL SERVICE SERVICES	at Stateville Correctional Center, mailing through the United States Postal
Pursuant to 29 LISC 1746 10 LISC 1604	•
Pursuant to 28 USC 1746, 18 USC 1621 or 735 I	LCS 5/1-109, I declare, under penalty of
perjury, that I am a named party in the above action	on, that I have read the above
documents, and that the information contained the	erein is true and correct to the base of
knowledge.	and confect to the best of my
DATE: July 15 , 2019	*MA * 0 0 1 1
DATE. <u>302(11.72013</u>	NAME: MERTO & FUGLETH DR
	DOC#: <b>B-5743</b> 0
-	Stateville Correctional Center
F	P.O. BOX <u>112</u>
<del>-</del>	Joliet, IL 60434
	on behalf of the plaintiff

815-727-3607

his request of me.